## EXHIBIT "A"

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey A. Brennan and Margaret J. Brennan

CHAPTER 13

**DEBTORS** 

BANKRUPTCY CASE NO.

Carrington Mortgage Services, LLC as servicer for

Bank of America, N.A.

18-15996/ELF

MOVANT

11 U.S.C. SEC. 362

VS.

Jeffrey A. Brennan and Margaret J. Brennan RESPONDENTS/DEBTORS

William C. Miller, TRUSTEE ADDITIONAL RESPONDENT(S)

CARRINGTON MORTGAGE SERVICES, LLC AS SERVICER FOR BANK OF AMERICA,
N.A.'S NOTICE OF DEFAULT OF STIPULATION

RE: PROPERTY KNOWN AS 109 East Manoa Road, Havertown, PA 19083

TO:

Jeffrey A. Brennan 109 East Manoa Road, Havertown, PA 19083

Margaret J. Brennan 109 East Manoa Road, Havertown, PA 19083

Brad J. Sadek, Esquire 1315 Walnut Street, Suite 502, Philadelphia, PA 19107 Sent via electronic notification: brad@sadeklaw.com

You are hereby notified that the Debtors are in default of the terms of the Stipulation entered into by the parties and approved by the Court. The Debtors have failed to make the following payments and late charges:

Regular payments of \$1,535.38 from June 1, 2019 through September 1, 2019	\$6,141.52;
Stipulation payments of \$1,451.31 from May 1, 2019 through July 1, 2019	\$4,353.93
Stipulation payment of \$1,451.35 from August 1, 2019 through August 1, 2019	\$1,451.35
Attorney fee for this Notice of Default	\$100.00
Less Suspense Balance	\$27.24
TOTAL DEFAULT	\$12,019.56

If the default continues to the following month, the Debtor shall include funds to cure that month's default as well. Pursuant to the terms of the Stipulation, the full cure of the default must

be via certified funds, money orders or cashier's check, with the loan number clearly written thereon and made payable to Carrington Mortgage Services, LLC. During pendency of this default, please remit all payments to:

Shapiro & DeNardo, LLC 3600 Horizon Drive, Suite 150 King of Prussia, PA 19406

The default must be cured within 15 days from the date below or Movant shall file a Certification of Default with the Court and request the Court to enter an Order granting Movant relief from the Automatic Stay.

Respectfully submitted,

Dated: September 5, 2019 BY:/s/ Kevin S. Frankel

Kevin S. Frankel, Esquire Shapiro & DeNardo, LLC 3600 Horizon Drive, Suite 150 King of Prussia, PA 19406

(610) 278-6800/ fax (847) 954-4809

S&D File #:18-060726 PA BAR ID #318323 kfrankel@logs.com pabk@logs.com